

NICHOLAS MARCHI
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Attorneys for Defendant

UNITED STATES DISTRICT COURT
IN AND FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LETICIA RODRIGUEZ,

Defendant.

Case No. 4:21-cr-6028-MKD-7

UNOPPOSED MOTION TO CONTINUE
TRIAL DATE AND RESETTING DATES
FOR FILING MOTIONS AND PRE-TRIAL
CONFERENCE AND ATTACHED
DECLARATION

Note: May 5, 2022
Judge Dimke at Richland, WA.

COMES now the defendant by and through her attorneys and requests this Court grant the defendant's request for a continuance of her pretrial conference and trial date. The defendant is currently scheduled for trial on May 23, 2022. The defendant would request that the trial be continued to July 15, 2022. The government does not oppose this request. This motion is based on the attached Declaration of Nicholas Marchi.

Dated this 5th day of April 2022.

Respectfully submitted,

s/ Nicholas Marchi
Nicholas Marchi, WSBA 19982
CARNEY & MARCHI
Attorneys for Defendant

DECLARATION

I, NICHOLAS MARCHI, first being duly sworn upon oath deposes and says:

1. I represent the defendant in the above cause of action. This action is currently scheduled for trial on May 23, 2022. I make this Declaration in support of the defendant's Motion to Continue the Trial date and Pre-Trial Conference.

2. On March 28, 2022, I received the discovery in this matter. As I just received the discovery, additional time is required to review the information and review it with the defendant.

3. I spoke with AUSA S. Van Marter, and she does not oppose the request. Ms. Rodriguez does not oppose this request and will file a Statement of Reasons in support of this request.

4. I declare under penalty of perjury that the foregoing is true and correct.

Dated this 5th day of April 2022, at Seattle WA.

s/ Nicholas Marchi

NICHOLAS MARCHI

CERTIFICATE OF SERVICE

I certify that a copy of the Defendant's Motion to Continue Sentencing was e-mailed via ECF on 4/5/2022, to S. Van Marter, Assistant United States Attorney, 402 E. Yakima Ave., Suite 210, Yakima, WA 98901.

S/ Nicholas Marchi
CARNEY & MARCHI, P.S.
Attorneys for Defendant